

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO., et al.)	Case No. 01-01139 (JKF)
)	
Debtors.)	(Jointly Administered)
)	

**WASHINGTON CLAIMANTS' SUPPLEMENTAL
RESPONSE TO DEBTORS' OBJECTIONS**

Eleven (11) claimants with Washington property damage claims¹ submit the following supplemental responses to Grace's objections to these claims. This filing is intended to supplement responses already filed by these claimants.

1. Objection D-2 (Statute of Limitations-Constructive Notice), Objection D-4 (Statute of Limitations-Actual Notice), and Objection D-6 (Doctrine of Laches).

These eleven Washington claimants are not subject to statute of limitations, statutes of repose, or the doctrine of laches under the doctrine of *nullum tempus* recognized under Washington law. Bellevue Sch. Dist. No. 405 v. Brazier Constr. Co., 103 Wash.2d 111, 114, 691 P.2d 178 (1984); R.C.W. 4.16.160 (2006)

¹ Sea-Tac Main Terminal Building (Claim No. 9645), Sea-Tac North Satellite Building (Claim No. 9646), Sea-Tac South Satellite Building (Claim No. 9647), General Administration Building-Capitol Complex (Claim No. 6937), Edmunds Community College (Claim No. 6938), Washington State University-Krueger McAllister Central (Claim No. 6939), Washington State University-Johnson Hall and Annex (Claim No. 6940), Washington State University-Daggy Hall (Claim No. 6941), Washington State University-Dana Hall (Claim No. 6942), Washington State University-Beasley Performing Arts Center/Pullman Coliseum (Claim No. 6943), Washington State University-McCoy Hall (Claim No. 6944).

2. Conclusion

The eleven (11) Washington State claimants are not subject to statutes of limitations, repose, or the doctrine of laches under the doctrine of *nullum tempus*.

Mt. Pleasant, SC
April 9, 2007

Respectfully Submitted by:

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-and-

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